



1/13/17

To: Reta Laford, Responsible Official
Pacific Northwest Electronic Warfare Range
Olympic National Forest, Pacific Ranger District
US Forest Service
1835 Black Lake Blvd. SW
Olympia, Washington 98512

Subject: OBJECTION, Pacific Northwest Electronic Warfare Range
Project Name: Pacific Northwest Electronic Warfare Range

Dear Ms. LaFord:

The Mountaineers is submitting this letter in objection to the draft decision of a Forest Service Special Use Permit that would allow the change of venue of electromagnetic warfare training to the Olympic Peninsula. We appreciate the opportunity to voice our concerns, as we did in our November 2014 comment on the proposal.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,800 skilled volunteers lead 3,200 outdoor education courses and activities annually for 15,500 members and guests. Our youth programs provide over 6,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, protecting the outdoor experience for current and future generations.

The Olympic Peninsula is home to the Olympic National Forest and Olympic National Park, where thousands of hikers, campers, snowshoers, climbers, backcountry skiers and photographers head to adventure each year. Many of our members travel to the Olympic Peninsula for the unique experiences that the peninsula offers from sandy beaches with haystack rocks to mountain meadows with clear, cold streams.

The Mountaineers continue to be concerned with the potential impacts of the electromagnetic training on this landscape and the people who enjoy it.

Specific concerns we have with the United States Forest Service (USFS) findings and draft decision include:

We are concerned that the documents and information needed to understand and properly object to the USFS Draft Decision are not available (as per 40 C.F.R. Sec. 1506.6(f)). For example, the original draft decision from June 2014 is not on USFS website and 1988 Master Agreement with Navy (which is



posted) indicates Navy had to give USFS analysis regarding “unsuitability or unavailability of DoD lands” for these activities. This analysis cannot be found.

We are concerned that the NEPA analysis, being split into many different document (USFS Draft Decision, Navy 2014 EA, Navy 2010 EIS, Navy 2015 EIS) makes understanding the decision confusing, especially since there is no clear discussion of what analysis is found where.

We are concerned that the scope of analysis is too narrow. The USFS draft decision attempts to limit scope to impacts from mobile emitter trucks but at same time on page one of the draft admits mobile emitters are connected to Navy aircraft activities. USFS had to disclose and analyze all direct, indirect and cumulative impacts, and impacts from connected actions-that includes impacts from the aircraft that would be conducting training using mobile emitters.

The Mountaineers’ history with federal public lands of the Olympic Peninsula goes backs to the beginning of our 110-year old organization, and we continue to advocate for the enjoyment and

protection of this entire landscape, both the National Forest and the Park. We are concerned that the scope of analysis ignores possible impacts to the Park and to designated Wilderness areas.

We encourage a full EIS for this process.

Sincerely,

Katherine Hollis

Conservation and Advocacy Director,
The Mountaineers